

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JAMES KARNES and : CHAPTER 13
LORRIE KARNES :
Debtor(s) :
 :
CHARLES J. DEHART, III :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
 :
JAMES KARNES and :
LORRIE KARNES :
Respondent(s) : CASE NO. 5-20-bk-02523

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 3rd day of November, 2020, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:

- a. 2019 Federal Income Tax return or statement that debtors were not required to file the tax return.

2. The Trustee provides notice to the Court as to the ineffectiveness of debtor(s) Chapter 13 Plan for the following reasons:

- a. Clarification of vesting of property should be at closing of case due to non-exempt equity in estate asset.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Agatha R. McHale

CERTIFICATE OF SERVICE

AND NOW, this 3rd day of November, 2020, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Michael McCrystal, Esquire
151 Main Street, Suite A
Emmaus, PA 18049

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee